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April 26, 2024

By ECF

Hon. Leda D. Wettre, U.S.M.J.
U.S. District Court
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *In re: Allergan Biocell Textured Breast Implant Prods. Liab. Litig.*,
Civil Action No. 2:19-md-02921-BRM-LDW

Dear Judge Wettre:

In response to Your Honor's April 19, 2024 text order, the parties propose the following response to the Stockholm District Court:

Plaintiffs request the Stockholm Court summon the following local counsel/representatives for the hearing for obtaining the testimony of Dr. Per Heden on August 22 and 23:

Anders Arthur
Sara Fall
Advokats from the firm of:

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Birger Jarlsgatan 15
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At this time, Defendants do not request the Stockholm Court to summon local counsel/representatives for the hearing on August 22 and 23. Defendants will notify the Stockholm Court no later than July 22, 2024 (30 days before the hearing) whether any local attorneys/representatives need to be summoned to the hearing by the Stockholm Court.

The parties will each present counsel to question Dr. Per Heden who have appeared in the Requesting Court.

We appreciate the Court's consideration of this matter.

Respectfully submitted,

/s/ James E. Cecchi
James E. Cecchi